

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MAYOR AND CITY COUNCIL OF
BALTIMORE,

Plaintiff,

v.

THE ESTATE OF JOSEPH BELL,
3130 Ravenwood Avenue
Baltimore, MD 21213

Serve: Anthony DeLaurentis, Personal
Representative,
2100 Jolie Pl.
Crofton, MD 21114

THE ACREAGE LAND COMPANY,
Formerly an unknown entity in the
State of Maryland
Served via SDAT

AND

THE STATE OF MARYLAND,
Serve: Brian Frosh, Attorney General
200 St. Paul Street
Baltimore, MD 21201

Also: Kimberly Stephens, Esquire
Counsel for the Comptroller
301 W. Preston Street, Suite 410
Baltimore, MD 21201

AND

UNITED STATES OF AMERICA
Serve: Merrick B. Garland
Attorney General
U.S. Department of Justice
10th Street & Constitution Avenue, NW
Washington, DC 20530

Civil No.

Also Serve: Robert K. Hur	*
U.S. Attorney's Office for the District	*
Of Maryland	*
36 S. Charles Street, 4 th Floor	*
Baltimore, MD 21201	*
	*
AND	*
	*
US BANK, CUSTODIAN FOR LLF1-MD, INC.,*	
A national association in the State of Maryland	*
Serve: The Corporation Trust, Resident Agent	*
2405 York Rd., Suite 201	*
Baltimore, MD 21093	*
	*
AND	*
	*
All persons having or claiming to have any	*
Interest in the property known as:	*
3130 Ravenwood Ave, Ward 08, Section 26,	*
Block 4178A, Lot 016	*
	*
Defendants.	*

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that the United States of America, by and through counsel, removes this action from the Circuit Court for Baltimore City, Maryland to the United States District Court for the District of Maryland, pursuant to 28 U.S.C. § 1446, and states as follows:

1. This action is now pending in the Circuit Court for Baltimore City, Maryland, Case No. 24-C-22-003402 FB. The Plaintiff brings this action to foreclose all interests in the property located at 3130 Ravenwood Avenue, Baltimore, MD

2. On August 15, 2022, the office of the United States Attorney for the District of Maryland received the *Summons* and *Complaint of In Rem Foreclosure*. A copy of all papers received by the office of the United States Attorney is attached hereto.

3. This removal may be brought pursuant to 28 U.S.C. § 1441 as it appears to be a civil action of which the federal district courts have original jurisdiction founded on a claim or right arising under the Constitution, treaties or laws of the United States.

4. This removal may also be brought pursuant to 28 U.S.C. § 1442 as one which appears to relate to the federal Defendant's actions under color of its office or in discharge of its official duties.

WHEREFORE, this action now pending in the Circuit Court for Baltimore City is properly removed.

Respectfully submitted,

Erek L. Barron
United States Attorney



Tarra DeShields
Assistant United States Attorney
36 S. Charles St., 4th Fl.
Baltimore, MD 21201
Ph. 410-209-4800

This *Notice of Removal* has been signed pursuant to Rule 11, Federal Rules of Civil Procedure.



Tarra DeShields
Assistant United States Attorney

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that on this 13th day of September 2022, a copy of the foregoing

Notice of Removal was sent, first class mail, postage prepaid, to:

Brian H. Kilgore, Esquire
Assistant City Solicitor
417 E. Fayette Street, Room 1001
Baltimore, MD 21201

The Estate of Joseph Bell
3130 Ravenwood Avenue
Baltimore, MD 21213

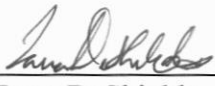
The Estate of Joseph Bell
Anthony DeLaurentis, Personal Representative
2100 Jolie Pl.
Crofton, MD 21114

The Acreage Land Company
Formerly an unknown entity in the State of Maryland
Served via SDAT
301 W. Preston Street, Room 801
Baltimore, MD 21201

The State of Maryland
Serve: Brian Frosh, Attorney General
200 St. Paul Street
Baltimore, MD 21201

Kimberly Stephens, Esquire
Counsel for the Comptroller
301 W. Preston Street, Suite 410
Baltimore, MD 21201

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Tarra DeShields
Assistant United States Attorney